

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

In re:	§	
	§	
Mary Lee Jones	§	Case No. 16-12549
	§	Chapter 13
	§	
Debtor(s).	§	

\* \* \* \* \*

**RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

Now comes, Servis One, Inc. dba BSI Financial Services, Inc. by its attorneys, Richard J. Rogers and Cohn, Goldberg & Deutsch, LLC, and in response to the Notice of Final Cure Payment states as follows:

1) Servis One, Inc. dba BSI Financial Services, Inc. disagrees that the Debtors have paid the full amount to cure the default on Creditor's claim.

2) Servis One, Inc. dba BSI Financial Services, Inc. disagrees that Debtor is current with respect to all payments consistent with §1322 (b) (5). The Debtor has outstanding MFR fees and costs as follows:

02/28/20	-181.00
02/28/20	-1,050.00

/s/ Richard J. Rogers  
Richard J. Rogers 01980  
Cohn, Goldberg & Deutsch, LLC  
600 Baltimore Avenue, Suite 208  
Towson, Maryland 21204  
(410) 296-2550  
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E-mail: [bankruptcyecf@cgd-law.com](mailto:bankruptcyecf@cgd-law.com)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2<sup>nd</sup> of October, 2020 that a copy of the foregoing

Response to Notice of Final Cure Payment was served by first class mail to:

Mary Lee Jones  
3807 Glenarm Avenue  
Baltimore, MD 21206  
Debtor(s)

And by electronic filing notification CM/ECF to:  
And debtor's(s') counsel:

James R. Logan  
2419 Maryland Avenue  
Baltimore, MD 21218  
Counsel to the Debtor(s)

Robert S. Thomas, II  
300 E Joppa Road, Suite 409  
Towson, MD 21286  
Chapter Trustee

/s/ Richard J. Rogers  
Richard J. Rogers